

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

MICHELLE J. KANE (CABN 210579)
Assistant United States Attorney

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
Facsimile: (510) 637-3724
E-Mail: michelle.kane3@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
GREGORY ALEXANDER,)
)
Defendant.)

No. CR 09-00719 EMC

STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME FROM
JULY 13, 2011, TO AUGUST 31, 2011.

With the agreement of the parties in open court on July 13, 2011, and with the consent of the defendant Gregory Alexander, the Court enters this order (1) setting a status conference in District Court on August 31, 2011, at 2:30 p.m., and (2) documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, from July 13, 2011, to August 31, 2011. The Court finds and holds, as follows:

1. The parties appeared before District Judge Edward M. Chen on July 13, 2011. At that time, counsel for the defendant, who is not in custody and was not present in court, represented that the parties had discussed progress in the matter and anticipated

[PROPOSED] ORDER EXCLUDING TIME
CR 09-00719 EMC

1 resolving the case. The defendant requested that time be excluded from the Speedy Trial
2 Act from to July 13, 2011, to August 31, 2011, to allow defense counsel further
3 preparation and to allow the parties to conduct needed investigation. The government
4 agreed to the proposed exclusion of time.

5 2. The Court finds that, taking into account the public interest in the prompt
6 disposition of criminal cases, granting the continuance to August 31, 2011, is necessary
7 for effective preparation of defense counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). Given these
8 circumstances, the Court finds that the ends of justice served by excluding the period
9 from July 13, 2011, to August 31, 2011, outweighs the best interest of the public and the
10 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

11 3. Accordingly, and with the consent of the defendant, the Court (1) sets a status
12 hearing on August 31, 2011, at 2:30 p.m., and (2) orders that the period from July 13,

13 //

2011, to August 31, 2011, is excluded from Speedy Trial Act computation under 18 U.S.C. §§ 3161(h)(1)(D) and 3161(h)(7)(A) and (B)(iv).

IT IS SO STIPULATED.

Dated: July 21, 2011

Respectfully submitted,

MELINDA HAAG
United States Attorney

/s/
MICHELLE J. KANE
Assistant United States Attorney

Dated: July 21, 2011

BARRY PORTMAN
Federal Public Defender

/s/
ELIZABETH FALK
Assistant Federal Public Defender
Counsel for Gregory Alexander

IT IS SO ORDERED.

DATED: July 25, 2011

